

REMARKS

Claims 1-10 are all the claims pending in the application.

The Examiner rejects claims 1-10 under 35 U.S.C. § 103(a) as being unpatentable over Pope in view of Goldstein.

Applicant respectfully traverses this rejection.

As explained in Applicant's previous Amendment filed February 5, 2003, Applicant's claimed invention defines a system, a controller, a remote control, and a method for controlling the system, which comprise unique combinations of features. These features include, *inter alia*, a remote control unit comprising a control-unit-sender for sending a control-signal for remotely controlling at least one device, and a controller-sender incorporated into a controller (which is coupled to a network and controls at least one device) for sending an interface to the remote control unit in response to a trigger-signal. Neither Pope nor Goldstein (applied alone or in any reasonable combination) teaches or suggests such a unique combination of features.

As explained in Applicant's previous Amendment, Pope discloses a cordless telephone 10 which includes memory 66 for storing appliance control codes (see Id., col. 4, lines 17-33, and Fig. 2). Telephone 10 sends appropriate control codes stored in memory 66 to base unit 12, which in turn transfers the codes to appropriate appliances; thereby controlling the appliances' operation (see id., col. 5, lines 14-32, and Fig 5). The Examiner acknowledges that Pope "is

silent on teaching the controller[base station 12]¹ sending an interface in response to a trigger-signal to the remote control [telephone 10]" (see final Office Action, pages 4 and 9).

The Examiner cites Pope at col. 4, lines 53-57, as allegedly teaching a remote control receiving information from a controller and storing the code in memory. Applicant respectfully disagrees.

The only relevant "controller" disclosed by Pope is base unit 12 (as noted by the Examiner). As explained in the previous Amendment, Pope does not disclose, teach or suggest that its telephone 10 receives any control information (e.g., control codes) from controller 12 for storage in memory 66. Instead, Pope discloses that telephone 10 can receive appliance control codes from remote controls provided with the appliances, "such as a television remote control" and store these codes in memory 66 (see id., col. 4, lines 52-57). In this regard, Pope discloses nothing more than that telephone 10 is capable of functioning as a conventional universal remote control (i.e., a learning remote control) (see Id., col. 4, lines 59-61).

Thus, Pope does not disclose, teach or even remotely suggest Applicant's claimed combination of features which require a controller connected to a network sending an interface to a remote controller, and a remote controller receiving and storing the interface sent by this type of a controller (see Applicant's independent claims 1, 7, 9 and 10).

¹ Here, as in the previous Office Action, the Examiner intended to refer to Pope's base unit "(12)", rather than telephone "(10)" (see Office Action pages 4-10, where the Examiner alleges that "Pope teaches a telecommunication system comprising a controller (12) to be coupled to a network..."). Applicant responds accordingly.

The Examiner alleges that Goldstein supplies the Pope's acknowledged deficiency (i.e., a controller which sends an interface in response to a trigger-signal) by describing a method of receiving the control codes that include requesting and receiving an interface from controller 6 through a bi-directional communication link (see final Office Action, page 3). In this regard, the Examiner alleges that Goldstein's cable box 6 corresponds to a controller as recited in Applicant's independent claims 1, 7, 9 and 10. Applicant respectfully disagrees.

In fact, Goldstein's cable converter 6 has nothing to do with a controller which is coupled to a network and comprises a controller-generator for generating at least one device-signal destined for at least one device for controlling operation of said at least one device, as recited in Applicant's independent claims 1, 7, 9 and 10. That is, Goldstein's cable converter 6 does not generate any device signals for controlling any devices, i.e., it is nothing more than a conventional cable converter connected in a conventional manner to a source of cable programming, a TV and (optionally) a VCR (see, for example, Goldstein, col. 16, line 17 through col. 18, line 22, and Fig. 14).

Clearly, one skilled in the art would not have been motivated to substitute Pope's controller 12 with Goldstein's cable converter 6. Indeed, this is contrary to Pope's actual disclosure where one of the appliances controlled by controller 12 is a cable box 16 (see Pope, Fig. 1). Thus, considering the Pope reference as a whole (which, as the Examiner correctly notes, is the proper analysis), one skilled in the art would not be motivated to modify Pope by the teachings of Goldstein with regard to the operation of its "controllers".

Therefore, as explained in Applicant's previous Amendment, even if, assuming *arguendo*, a skilled artisan would have been motivated to incorporate Goldstein's design for a programmable remote control into Pope's cordless telephone 10, the only reasonable resulting combination would amount to nothing more than Pope's "cable 16" being replaced with Goldstein's cable converter 6. In this resulting combination, Pope's base unit 12 would not be sending an interface to cordless telephone 10 in response to a trigger-signal. Instead, Pope's cordless telephone 10 would simply be programmed directly by cable box 16 to have the codes of cable box 16, rather than by a remote control unit provided with cable box 16 (see Pope, col. 4, lines 52-61). Thus, contrary to the Examiner's analysis, Goldstein does not supply the acknowledged deficiency of Pope.

In summary, Applicant's independent claims 1, 7 and 9-10, as well as the dependent claims 2-6 and 8 (which incorporate all the novel and unobvious features of their base claims) would not have been obvious from any reasonable combination of Pope and Goldstein at least for the reasons set forth above.

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

RESPONSE UNDER 37 C.F.R. § 1.116
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The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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